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29 Attorneys for Plaintiff
30 KEVIN ROE

31 UNITED STATES DISTRICT COURT

32 EASTERN District OF CALIFORNIA

33 KEVIN ROE,

34 Case No. 2:22-CV-01536-KJM-AC

35 Plaintiff,

36 **STIPULATION AND [PROPOSED] ORDER**
37 **TO CONTINUE EXPERT WITNESS**
38 **DISCOVERY DEADLINES**

39 v.

40 CITY OF FAIRFIELD, a municipal

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G dcl#F Jwl#F dclirujd# 7348#

1 corporation, SETH JAMEL, individually
 2 and in his official capacity as a Police
 3 Officer for the CITY OF FAIRFIELD
 4 Police Department, CAMILLE LANGI,
 5 individually and in her official capacity as
 6 a Police Officer for the CITY OF
 7 FAIRFIELD Police Department,
 OFFICER DEQUATTRO, individually
 and in his official capacity as a Police
 Officer for the CITY OF FAIRFIELD
 Police Department and DOES 1-50,
 inclusive, individually, jointly, and
 severally;

Hon. Kimberly J. Mueller

8 Defendants.

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 10 Come now Defendants City of Fairfield, Seth Jamel, Joseph DeQuattro, and Camille
 11 Langi (“DEFENDANTS”) and Plaintiff Kevin Roe (“PLAINTIFF”) by and between their
 12 respective counsel of record, hereby agree and stipulate as follows:

13 1. WHEREAS, this matter is not currently scheduled for Trial.
 14 2. WHEREAS, March 20, 2023, the Court issued a Rule 16 Scheduling Order (Doc. 29).
 15 3. WHEREAS, the parties are scheduled for Settlement conference before Magistrate Judge
 16 Allison Claire on March 5, 2024. (Doc. 49).
 17 4. WHEREAS, counsel for both Plaintiff and Defendants have agreed to extend the cut-off
 18 for Expert Witness Disclosures to April 1, 2024, extend the rebuttal witness disclosure
 19 deadline to April 16, 2024.
 20 5. WHEREAS, the parties do not seek an extension of the discovery cut off deadline,
 21 currently set for February 3, 2024.
 22 6. WHEREAS, counsel for both Plaintiff and Defendants have agreed to conduct Expert
 23 Discovery *only* up to and including May 13, 2024.
 24 7. WHEREAS, The parties submit that good cause exists for this continuance. There has
 25 been one prior continuance.
 26 8. WHEREAS, the parties request the Court to amend the case schedule as follows.

Expert Disclosures Deadline	4/1/24
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1	Rebuttal Expert Disclosures Deadline	4/16/24
2	Close of Discovery	2/23/24 [no change]
3	Close of Expert Discovery	5/13/24
4	Dispositive Motion Filing Deadline	4/12/24 [no change]
5	Dispositive Motion Hearing	5/17/24 [no change]

7 IT IS SO AGREED

8 Respectfully submitted,

9 January 31, 2024

10 CASTILLO, MORIARTY,
11 TRAN & ROBINSON, LLP

12 By: /s/ John Robinson
13 PATRICK MORIARTY
14 JOHN B. ROBINSON
15 EDWARD VIEIRA-DUCEY
16 Attorneys for Defendant
17 CITY OF FAIRFIELD, SETH JAMEL, and
18 JOSEPH DEQUATTRO

19 Dated: January 31, 2024

20 PORTER SCOTT

21 By: /s/ Carl. L. Fessenden
22 CARL L. FESSENDEN
23 SULI A. MASTORAKOS
24 Attorneys for Defendant,
25 CAMILLE LANGI,

26 Dated: January 31, 2024

27 LAW OFFICES OF JOHN BURRIS

28 By: /s/ Christopher Dean
29 JOHN L. BURRIS
30 BENJAMIN NISENBAUM
31 CHRISTOPHER DEAN
32 Attorneys for Plaintiff
33 KEVIN ROE

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1 **PROPOSED ORDER**
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4 PURSUANT TO STIPULATION, IT IS SO ORDERED.
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7 Dated: February 1, 2024
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11 Allison Claire
12 ALLISON CLAIRE
13 UNITED STATES MAGISTRATE JUDGE
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